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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☒ Affects Both Debtors  
☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company

Case No. 19-30088 (DM) (Lead Case)  
Chapter 11  
(Jointly Administered)

**STIPULATION REGARDING  
SCHEDULING WITH RESPECT TO  
SECURITIES LEAD PLAINTIFF'S  
MOTION TO APPLY BANKRUPTCY  
RULE 7023 TO CLASS PROOF OF  
CLAIM [ECF NO. 5042]**

**Objection Deadline:** January 14, 2020 at  
4:00 PM (Pacific Time)

**Reply Deadline:** January 22, 2020 at 4:00  
PM (Pacific Time)

**Hearing Date:** January 29, 2019 at 10:00  
AM (Pacific Time)

1 WHEREAS, on December 9, 2019, Public Employees Retirement Association of New  
2 Mexico (“PERA”), the court-appointed lead plaintiff in the securities class action captioned as *In*  
3 *re PG&E Corporation Securities Litigation*, Case No. 18-03509 (the “Securities Litigation”)  
4 pending in the United States District Court for the Northern District of California, on behalf of  
5 itself and the proposed class it represents in the Securities Litigation (the “Class”), together with  
6 York County on behalf of the County of York Retirement Fund, City of Warren Police and Fire  
7 Retirement System, and Mid-Jersey Trucking Industry & Local No. 701 Pension Fund filed  
8 *Securities Lead Plaintiff's Motion To Apply Bankruptcy Rule 7023 To Class Proof Of Claim Filed*  
9 *by Interested Party Securities Lead Plaintiff and the Proposed Class* (the “Rule 7023 Motion”)  
10 [ECF No. 5042].

11 WHEREAS, concurrently with the filing of the Rule 7023 Motion, Lead Plaintiff filed a  
12 notice of hearing setting a hearing on the Rule 7023 Motion for the January 14, 2020 omnibus  
13 hearing [ECF No. 5043].

14 WHEREAS, PERA and the above-captioned debtors in possession (the “Debtors” and  
15 together with PERA, on behalf of itself and the Class, the “Parties”) have agreed to the briefing  
16 and hearing schedule set forth in this Stipulation for the Rule 7023 Motion.

17 NOW, THEREFORE, the Parties hereby stipulate and agree as follows, subject to approval  
18 of the Court:

19 1. The hearing on the Rule 7023 Motion is rescheduled to the January 29, 2020 omnibus  
20 hearing.

21 2. The Debtors shall have until January 14, 2020 at 4:00 p.m. (Pacific) to file their  
22 objection, if any, to the Rule 7023 Motion.

23 3. If the Debtors file an objection to the Rule 7023 Motion, PERA shall have until  
24 January 22, 2020 at 4:00 p.m. (Pacific) to file its reply, if any, in further support of the Rule 7023  
25 Motion.  
26  
27  
28

1 December 24, 2019

**WEIL, GOTSHAL & MANGES LLP  
KELLER & BENVENUTTI LLP**

By: /s/ Peter J. Benvenutti  
Peter J. Benvenutti  
*Counsel to the Debtors in Possession*

5 December 24, 2019

**LOWENSTEIN SANDLER LLP  
MICHELSON LAW GROUP**

By: /s/ Randy Michelson  
Randy Michelson  
*Bankruptcy Counsel to Lead Plaintiff and the Class*